

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

Title of action:

Daniel Conceicao

(Plaintiff)

Vs

National Water Main Cleaning Company

Carylon Corporation

(Defendants)

14-5146  
(WJM)

**PARTIES**

(Plaintiff)

Daniel Conceicao

19 north 18<sup>th</sup> street

Kenilworth, NJ 07033

(Defendants)

National Water Main Cleaning Company

1806 Newark Turnpike

Kearney, NJ 07032

973)483-3200 1800-621-4343

Carylon Corporation

2500 west Arthington Street

Chicago, IL 60612- 4108

312) 666-7700 1800-621-4342

**RECEIVED**

**AUG 18 2014**

AT 8:30 \_\_\_\_\_M  
WILLIAM T. WALSH, CLERK

### **JURISDICTION**

As an employee of National Water Main Cleaning Company I preformed work in various states, Including New York, New Jersey, Connecticut, Massachusetts, Pennsylvania, Virginia, and Maryland.


### **CAUSE OF ACTION**

As an employee of National Water Main Cleaning Company since April 9, 2005 I didn't get paid the appropriate wage rates, overtime, time and a half, time traveling with debris from the job, fringe benefits, travel time from job to job and on portal to portal jobs. Under the New Jersey Prevailing Wage Act, Fair Labor Standard Act, Davis Bacon Act, and the McNamara Service Contract Act. The company supplied benefits to its employees and every week made deductions out of my hourly wages for medical and dental benefits, when in fact we were to be paid out of my fringe benefits. The company also maintained an employee retirement account called an E.S.O.P. (account employee stock account) maintained by the parent company Carylton Corporation. The company never made a clear understanding of what was being paid from our hourly fringe benefits and why the company still made deductions out of our hourly wage. They would also classify their employees as laborers even when they would operate equipment so they wouldn't pay the higher rates .

### **DEMAND**

I want to be paid what is owed to me. I want to be compensated for all hours worked and paid benefits prescribed under contract and under the laws and actions stated above.

Signed

 8/18/14  
(Signed by the plaintiff)

Print

Daniel Conceicao 8/18/14